

EDWARD H. KUBO, JR. #2499
United States Attorney
District of Hawaii

RONALD G. JOHNSON #4532
Chief, Major Crimes

WES R. PORTER #7698
CLARE E. CONNORS #7936
Assistant U.S. Attorneys
Room 6-100, PJKK Federal Bldg.
300 Ala Moana Boulevard
Honolulu, HI 96850
telephone: 541-2850
facsimile: 541-2958
e-mail: wes.porter@usdoj.gov
clare.connors@usdoj.gov

Attorneys for Plaintiff
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	CR. NO. 05-00261 HG
)	
Plaintiff,)	
)	
vs.)	UNITED STATES' WRITTEN NOTICE
)	PURSUANT TO FEDERAL RULE OF
JAMES TROIANO,	(01)	EVIDENCE 404(b); EXHIBITS A &
aka: "JOHN KLATT,")	B; CERTIFICATE OF SERVICE.
WENDELL K. TOKI,	(02)	
)	
Defendants.)	
)	
)	

COMES NOW the United States of America, by and through its attorneys, Edward H. Kubo, Jr., United States Attorney for the District of Hawaii, Wes R. Porter and Clare E. Connors, Assistant United States Attorneys, and hereby provides notice of its intent to offer evidence in its case-in-chief of prior acts

committed by defendant James Troiano. Although the United States has made various disclosures to the defendants in prior discovery and correspondence, the United States is filing this notice to ensure compliance with the Court's standing order.

The United States has attached to this pleading the two letters provided to defense counsel regarding the United States' intent to use evidence of prior acts committed by defendant Troiano in its case-in-chief. See Exhibits A & B.

DATED: January 4, 2006, at Honolulu, Hawaii.

Respectfully submitted,
EDWARD H. KUBO, JR.
United States Attorney
District of Hawaii

By /s/ Clare E. Connors
WES R. PORTER
CLARE E. CONNORS
Assistant U.S. Attorneys

CERTIFICATE OF SERVICE

I hereby certify that, on the dates and by the methods of service noted below, a true and correct copy of the foregoing was served on the following at their last known addresses:

Served by First Class Mail:

Todd Eddins January 4, 2006
Pauahi Tower
1001 Bishop Street, Ste. 1320
Honolulu, HI 96813

Attorney for Defendant
JAMES TROIANO

Attorney for Defendant
WENDELL R. TOKI

DATED: January 4, 2006, at Honolulu, Hawaii.

/s/ Iris Tanaka